



49 Woodside Street, Stamford, CT 06902

November 25, 2012

Kimberly N. Tisa, PCB Coordinator
United States Environmental Protection Agency
1 Congress Street, Suite 1100 - CPT
Boston, Massachusetts 02114-2023

RE: PCB Cleanup and Disposal Notification
Joseph A. DePaolo Middle School
385 Pleasant Street, Southington, CT

Dear Ms. Tisa:

As part of the upcoming renovation project at the Joseph A. DePaolo Middle School, 385 Pleasant Street, Southington, CT, Hygenix, Inc. was hired to investigate the presence and location of various hazardous materials that might impact the project. Included in the investigation, building materials, including but not limited to caulk, glazing and vapor barrier materials were sampled for polychlorinated biphenyls (PCBs). While the purpose of this letter is to address the PCB's, it is significant to note that many of the materials identified as containing PCBs were also found to be asbestos containing materials with greater than 1% asbestos. I am submitting this remediation plan as a combination of removal and off-site disposal of PCB bulk product waste under § 761.62, self-implementing clean-up and disposal under § 761.61(a) and/or a risk-based clean-up and disposal request under § 761.61(c) and an alternative sampling approval under § 761.79(h) for the project site.

Building Description

The Joseph A. DePaolo Middle School was constructed in 1966 and has served the community for decades, providing a place for students in grades 6-8. The two-story facility is approximately 108,000 square feet and includes a variety of resources such as an interactive media center, arts room, gymnasium and auditorium. The school is designed with a capacity of 600 students and currently serves nearly 740 students. Since its construction there have been no upgrades.

The building is a two-story structure with a built-up roofing system. The walls are constructed mainly of glazed and un-glazed blocks and the exterior walls are primarily brick.

The proposed project is to renovate the building "as new" adding approximately 32,000 square feet and increasing the schools capacity to 811 students. The scope of the work is as follows:

- 12 new general classrooms
- Eight renovated science lab classrooms
- New guidance/student service areas
- New computer lab
- Expanded multi-use cafeterias
- Renovated kitchen
- New Media Center
- Two new art rooms
- Renovated graphics and tech labs

- Enlarged health office
- New and renovated music rooms
- New mechanical and electrical systems
- New technology/security systems
- Additional parking
- Improved traffic circulation

Nature of Contamination - 761.61 (3)(A)

On August 13, 14, 29 & 30th, 2012 representatives from HYGENIX, Inc. visited the above referenced location to perform an investigation of the materials that are present throughout the building that will be disturbed during the future demolition project for polychlorinated biphenyls (PCBs). A visual inspection was first performed to identify the different types of materials that may be disturbed during the demolition activities. Sampling was then performed on each type building material system, following the EPA's "Standard Operating Procedure For Sampling Porous Surfaces for Polychlorinated Biphenyls (PCBS)" dated 05/05/11, and submitted to Con-Test Analytical Laboratory for analysis by the Environmental Protection Agency (EPA) required Soxhlet method. Of the samples collected, most were found to have PCBs present and many of the materials had PCB levels greater than 50 PPM (See Attachment #2 for a table summary of all sample results).

Based on the sample results, it was immediately decided to perform air sampling throughout the school to determine if the air quality in the building was acceptable for student occupancy. On September 9th and 10th, 2012, in accordance with USEPA Compendium Method TO-10A, air samples were collected at the site. Two air samples were collected from the second floor of the building and four air samples were collected from the first floor of the building. The samples were delivered to YORK Analytical Laboratories, Inc. where they were analyzed. Of the samples collected, none were found to have detectable levels of PCBs present in them (See Attachment #3 for a table summary of all sample results).

Contaminated and Adjacent Areas – 761.61 (3)(B)

A third inspection was then performed on October 8, 2012. The purpose of this inspection was to determine the following:

1. To determine if adjacent building materials to PCB containing caulk had become contaminated.
2. To determine if soils/asphalt/concrete below caulk locations had become contaminated.
3. To determine if caulk materials >1 PPM <50 PPM are an original source or contaminated from a previous application

For caulking materials identified as >50 PPM sampling was performed on the building materials three (3") inches away from the caulk on exterior brick materials and six (6") inches away from caulk on interior cinderblock to determine the outer extent of contamination. Sampling was performed following the EPA's "Standard Operating Procedure For Sampling Porous Surfaces for Polychlorinated Biphenyls (PCBS)" dated 05/05/11, and submitted to Con-Test Analytical Laboratory for analysis by the Environmental Protection Agency (EPA) required Soxhlet method (See Attachment #2 for a summary of all sample results).

For caulking materials identified as >1 PPM and <50 PPM sampling was performed on the building materials directly adjacent to the caulk to try and establish that the material is an excluded product. Sampling was performed following the EPA's "Standard Operating Procedure For Sampling Porous Surfaces for Polychlorinated Biphenyls (PCBS)" dated 05/05/11, and

submitted to Con-Test Analytical Laboratory for analysis by the Environmental Protection Agency (EPA) required Soxhlet method (See Attachment #2 for a summary of all sample results).

While there are no surrounding soils, asphalt or concrete in direct contact with the PCB containing material, samples were collected from location directly below caulk on each side of the building as a precautionary measure. Prior to sampling asphalt, water was applied to the surface to reduce dust generation and a core sampler was used to remove a sample of the material which was then placed directly into a labeled container. All equipment was wet cleaned using a phosphate-free detergent followed by Hexane between each sample location. A chain-of-custody was then completed and the samples were submitted to Con-Test Analytical Laboratory for analysis by the Environmental Protection Agency (EPA) required Soxhlet method (See Attachment #2 for a summary of all sample results).

Location & Extent of the Identified Contaminated Area – 761.61 (3)(C)

Based on the sample results collected the location and extent of contamination for the building is limited to caulk, glazing, floor vapor barriers, unit ventilator mastic, exterior vapor barrier, brick and cinderblock material. See Attachment #4 for an inventory table of PCB containing materials, locations and quantities. A Topographic map, site map and elevations with the location of PCB containing materials are also provided.

PCB Cleanup Plan – 761.61 (3)(D)

Based on the initial samples and the follow-up inspection of building materials, a cleanup plan has been created to remove all building materials containing PCBs greater than 1 PPM, and all contaminated building materials to less than 1 PPM. The only material that we are recommending be left in place is the PCB containing vapor barrier. This recommendation is an interim measure to prevent the costs of remediation from growing so large that it prohibits the renovations and addition project from moving forward. The original intention of the overall project was to remove the outer wall in only a limited number of locations to allow for building additions to be “tied-in” to the original structure. The PCB containing vapor barrier/mastic is present between the interior cinderblock wall and the exterior brick wall. Because it is completely enclosed and inaccessible there are no potential exposure pathways to human health and the environment or potential for PCB transfer via direct contact and/or leaching to other building materials. The vapor barrier will be left in place until the “useable” life of the building has been completed. At this time a second application will be submitted to for the proper removal and disposal of the remaining materials (see Attachment #5).

Written Certification – 761.61 (3)(E)

Please see Attachment #6 for the written certification.

Long-Term Maintenance and Monitoring Plan

PCB vapor barrier/mastic was applied directly to the building structure on the cinderblock walls between the interior and exterior of the building. The original scope of work for the project was to remove limited locations of the exterior walls to allow new additions to be connected to the original structure. It was never the intention of the Town of Southington to remove the entire exterior wall system and the cost and time delays associated with performing this removal would compromise the entire project. Since the PCB containing material is completely enclosed and inaccessible we are recommending leaving the material in place as an interim solution. The solid block wall on the interior of the building and the solid brick wall on the exterior of the building provide a barricade that eliminates potential exposure pathways or the potential for PCB transfer via direct contact and/or leaching to other building materials. A long-term maintenance and monitoring plan will be required for the site in order to ensure that the material remains in stable

condition, that any repairs that are required are performed, that training of staff is maintained and that building occupants and the surrounding environment remain protected. This plan will be developed following the completion of the remediation activities at the site and implemented after the review and approval of the US EPA. The plan will consist primarily of the following:

- Visual Inspections
- TO-10A Indoor Air Sampling
- Annual Reporting to the US EPA & CT DEEP
- Corrective Actions (if required)
- Faculty & Staff Communications & Training

Project Schedule

Remediation activities on the PCB containing materials will begin following the approval of this plan during the early summer of 2013. It is the plan of the Town of Southington (Owner) to have all planned environmental remediation for the building completed by end of 2015.

Connecticut Department of Energy & Environmental Protection Notification

Please see Attachment #6 for the FedEx shipping label. A complete copy of this notification was provided.

Thank you in advance for your time. If you have any questions, comments, concerns or would like to discuss this issue further please call me at the office 203-324-2222. Thank you.

Regards,



James Twitchell
HYGENIX Inc.

ATTACHMENT 1
SITE ARIAL PHOTOGRAPH & BUILDING PHOTOGRAPHS

JOSEPH A. DEPAOLO MIDDLE SCHOOL, 385 PLEASANT STREET, SOUTHINGTON, CT





North Side of Building (West End – Cafeteria & Music)



North Side of Building (East End – Tech. Wing)



West Side of Building (North End)



West Side of Building



West Side of Building (South End)



South Side of Building



East Side of Building (South looking North)



East Side of Building (North End – Locker Rooms)



East Side of Building (Gymnasium & Tech.)



North Side of Building (Upper & Lower Windows)



North End of Building (West Tech Window & North Entrance)



Moisture Barrier Between Exterior Brick Wall & Interior Cinderblock Wall



Joseph A. DePaolo Middle School (Typical Classroom)

**ATTACHMENT 2
PCB SAMPLES LOCATIONS**

JOSEPH A. DEPAOLO MIDDLE SCHOOL
385 PLEASANT STREET, SOUTHTON, CT
PCB SOURCE MATERIAL & BUILDING MATERIAL SAMPLE LOCATION & RESULTS

SOURCE MATERIAL DESCRIPTION	SAMPLE #	RESULT	BUILDING MATERIAL SAMPLE LOCATIONS	SAMPLE #	RESULT	COMMENTS
Exterior Window Caulk	081412-01 081412-02 081412-03 081412-04	2.2 PPM (1254) 3.4 PPM (1254) None Detected 2.5 PPM (1254)	At the caulk line on the brick or concrete to determine if substrate has any contamination. Exact locations are on the laboratory results and sample location maps.	EXTB-01 EXTB-05 EXTB-07 EXTB-11 EXTB-18 EXTB-23 EXTB-27 EXTB-28	None Detected None Detected None Detected None Detected None Detected None Detected None Detected	Based on the visual inspection of the caulk material and the lack of PCBs with in building materials at the point of contact between the caulk and the building material, PCB Bulk Product Waste was never present at any of these locations and all of the caulk materials have been determined to be Excluded PCB Products. Caulks with total PCB concentrations > 1 mg/kg and <50 mg/kg are regulated by the State of Connecticut and must be handled in accordance with CT RCSA 22a-463 - 469. The material is also asbestos containing. Based on the initial sample results of the caulk and the building materials at the caulk line no additional verification sampling is proposed. The material is proposed for removal after the removal of the window.
Exterior Window Glazing	081412-05 081412-06 081412-07 081412-08	None Detected None Detected 0.94 PPM (1254) None Detected	No samples collected since the glazing is contained inside the window system and all samples are < 1 PPM.			Glazing/any materials with total PCB concentrations > 1 mg/kg and <50 mg/kg are regulated by the State of Connecticut and must be handled in accordance with CT RCSA 22a-463 - 469. The material is also asbestos containing. No additional sampling is proposed after the removal of the window.
Exterior Vent Caulk	081412-09 081412-10 081412-11	None Detected None Detected None Detected	At the caulk line on the brick or concrete to determine if substrate has any contamination. Exact locations are on the laboratory results and sample location maps.	EXTB-03 EXTB-04 EXTB-08 EXTB-15 EXTB-15 DUP EXTB-22 EXTB-24 EXTB-30 EXTB-35	None Detected None Detected None Detected None Detected None Detected None Detected None Detected None Detected	The vent caulk and adjacent building materials did not have PCB levels > 1 PPM. This material is not regulated by the US EPA or CT DEEP for PCBs. The material is asbestos containing. No additional sampling is proposed.
Exterior Metal Double Door Caulk	081412-12 081412-13 081412-14 081412-15 081412-16 081412-17	1.3 PPM (1254) 0.77 PPM (1254) None Detected 2.5 PPM (1254) 4.1 PPM (1254 & 1268) 3.3 PPM (1254 & 1268)	At the caulk line on the brick or concrete to determine if substrate has any contamination. Exact locations are on the laboratory results and sample location maps.	EXTB-10 EXTB-13 EXTB-16 EXTB-20 EXTB-21 EXTB-25 INT-24 INT-24 DUP INT-27 INT-31 INT-38 INT-39 INT-40	None Detected None Detected None Detected None Detected None Detected None Detected None Detected None Detected None Detected None Detected None Detected None Detected	Based on the visual inspection of the caulk material and the lack of PCBs with in building materials at the point of contact between the caulk and the building material, PCB Bulk Product Waste was never present at any of these locations and all of the caulk materials have been determined to be Excluded PCB Products. Caulks with total PCB concentrations > 1 mg/kg and <50 mg/kg are regulated by the State of Connecticut and must be handled in accordance with CT RCSA 22a-463 - 469. The material is also asbestos containing. Based on the initial sample results of the caulk and the building materials at the caulk line no additional verification sampling is proposed after the material is removed.
Interior Door Caulk			At the caulk line on the brick or concrete to determine if substrate has any contamination. Exact locations are on the laboratory results and sample location maps.			
Vertical Expansion Joint Caulk	081412-18 081412-19 081412-20	None Detected 3.4 PPM (1254 & 1268) 2.0 PPM (1268)	At the caulk line on the brick or concrete to determine if substrate has any contamination. Exact locations are on the laboratory results and sample location maps.	EXTB-02 EXTB-06 EXTB-06 DUP EXTB-09 EXTB-12 EXTB-17 EXTB-19 EXTB-26	None Detected None Detected None Detected None Detected None Detected None Detected None Detected	Based on the visual inspection of the caulk material and the lack of PCBs with in building materials at the point of contact between the caulk and the building material, PCB Bulk Product Waste was never present at any of these locations and all of the caulk materials have been determined to be Excluded PCB Products. Caulks with total PCB concentrations > 1 mg/kg and <50 mg/kg are regulated by the State of Connecticut and must be handled in accordance with CT RCSA 22a-463 - 469. The material is also asbestos containing. Based on the initial sample results of the caulk and the building materials at the caulk line no additional verification sampling is proposed.

PCB cleanup and disposal notification under § 761.61(a) and § 761.79(n)
Joseph A. DePaolo Middle School, Southington, CT

November 2012

Through Wall Metal Flashing Caulk	081 412-21 081 412-22 081 412-23	2.0 PPM (1254) None Detected 2.2 PPM (1254)	At the caulk line on brick or concrete to find the outer extent. Exact locations are on the laboratory results and sample location maps.	EX-TB-29 EX-TB-31 EX-TB-33 EX-TB-34	None Detected None Detected None Detected None Detected	Based on the visual inspection of the caulk material and the lack of PCBs with in building materials at the point of contact between the caulk and the building material, PCB Bulk Product Waste was never present at any of these locations and all of the caulk materials have been determined to be Excluded PCB Products. Caulks with total PCB concentrations > 1 mg/kg and < 50 mg/kg are regulated by the State of Connecticut and must be handled in accordance with CT RCSEA 22a-463 - 469. The material is also asbestos containing. Based on the initial sample results of the caulk and the building materials at the caulk line no additional verification sampling is proposed after the material is removed.
Sidewalk Black Fill	081 412-24 081 412-25 081 412-26	1.5 PPM (1254) 18 PPM (1254) 4.2 PPM (1254)	Directly Adjacent from fill in concrete to find the outer extent. Exact locations are on the laboratory results and sample location maps.	EX-TG-01 EX-TG-02 EX-TG-03 EX-TG-03DUP	None Detected None Detected None Detected None Detected	Based on the visual inspection of the caulk material and the lack of PCBs with in building materials at the point of contact between the caulk and the building material, PCB Bulk Product Waste was never present at any of these locations and all of the caulk materials have been determined to be Excluded PCB Products. Caulks with total PCB concentrations > 1 mg/kg and < 50 mg/kg are regulated by the State of Connecticut and must be handled in accordance with CT RCSEA 22a-463 - 469. The material is also asbestos containing. Based on the initial sample results of the caulk and the building materials at the caulk line no additional verification sampling is proposed after the material is removed.
Interior Glass Door Caulk	081 412-27 081 412-28 081 412-29	22 PPM (1254) 41 PPM (1254) 35 PPM (1254)	Adjacent from caulk on cinderblock to find the outer extent. Exact locations are on the laboratory results and sample location maps.	INT-01 INT-02 INT-03 INT-03 DUP	1.8 PPM (1254) 4.2 PPM (1254) 0.98 PPM (1254) 0.57 PPM (1254)	Based on the visual inspection of the caulk material and the lack of PCBs with in building materials at the point of contact between the caulk and the building material, PCB Bulk Product Waste was never present at any of these locations and all of the caulk materials have been determined to be Excluded PCB Products. Caulks with total PCB concentrations > 1 mg/kg and < 50 mg/kg are regulated by the State of Connecticut and must be handled in accordance with CT RCSEA 22a-463 - 469. The material is also asbestos containing. Post remediation sampling will be performed on each side of each door opening. There will be approximately 28 samples collected.
Interior Corner Wall Caulk	081 412-30 081 412-31 081 412-32	33 PPM (1254) 3,100 PPM (1254) 11 PPM (1254)	Six inches from caulk on cinderblock from either the corner wall or metal column to find the outer extent. Samples were collected randomly from the inner and outer wall of classrooms and hallways. Exact locations are on the laboratory results and sample location maps.	INT-04 INT-05 INT-06 INT-07 INT-08 INT-09 INT-10 INT-11 INT-12 INT-13 INT-14 INT-15 INT-16 INT-17 INT-18 INT-19 INT-20 INT-21 INT-22 INT-23 INT-25 INT-26 INT-26 DUP INT-28	1.8 PPM (1254) 2.0 PPM (1254) 0.54 PPM (1254) 2.9 PPM (1254) 1.3 PPM (1254) 3.5 PPM (1254) 5.1 PPM (1254) 1.3 PPM (1254) 1.2 PPM (1254) 1.5 PPM (1254) 2.4 PPM (1254) 6.4 PPM (1254) 0.73 PPM (1254) 1.9 PPM (1254) 7.7 PPM (1254) 1.7 PPM (1254) 1.6 PPM (1254) 0.92 PPM (1254) 1.5 PPM (1254) 1.2 PPM (1254) 0.69 PPM (1254) 5.0 PPM (1254) 2.5 PPM (1254) 4.3 PPM (1254)	This material is regulated by the US EPA. The material is also asbestos containing. Post remediation sampling will be performed from each corner wall and from each column in each room/location. There will be approximately 572 samples collected.

PCB cleanup and disposal notification under § 761.6(a) and § 761.79(h)
Joseph A. DePaolo Middle School, Southington, CT

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Interior Window Glazing	081412-33 081412-34 081412-35	29 PPM (1254) 2.8 PPM (1254) 4.3 PPM (1254)	No samples collected since the glazing is contained inside the window system	INT-29 INT-30 INT-32 INT-33 INT-34 INT-35 INT-36 INT-37	5.8 PPM (1254) 1.3 PPM (1254) None Detected None Detected None Detected None Detected 0.56 PPM (1254) None Detected	The material is also asbestos containing. No additional sampling is proposed after the removal of the windows.
Outer Wall Vapor Mastic/Paper	083112-08 083112-09 083112-10	3.8 PPM (1254) 120 PPM (1254) 120 PPM (1254)	No samples collected since material is bound between the exterior brick and the interior cinderblock walls.			This material is regulated by the US EPA. The material is applied directly to the block wall. There is a 3'-4" gap between the block and the outer brick wall. The material is also asbestos containing.
Ceramic Floor Vapor Mastic/Paper	083112-05 083112-06 083112-07	7.8 PPM (1242) 2.7 PPM (1242) 2.5 PPM (1242)	No samples collected since the material is not accessible.			Materials with total PCB concentrations > 1 mg/kg and < 50 mg/kg are regulated by the State of Connecticut and must be handled in accordance with CT FICSA 22a-463 - 469. The material is also asbestos containing. No additional sampling is proposed after the removal of the flooring system and the layer of concrete floor below.
Unit Ventilator Mastic/Paper	083112-11 083112-12 083112-13 083112-14	46 PPM (1254) 75 PPM (1254) 87 PPM (1254) 51 PPM (1254)	No samples were collected the entire unit will be removed and disposed of as PCB waste.			This material is regulated by the US EPA. No additional sampling is proposed since the entire unit is to be removed and disposed of.
Roof Field	083112-01 083112-02 083112-03 083112-04	None Detected None Detected None Detected None Detected				The roofing materials are not PCB containing materials.

PCB cleanup and disposal notification under § 761.61(a) and § 761.79(h)
Joseph A. DePaolo Middle School, Southington, CT

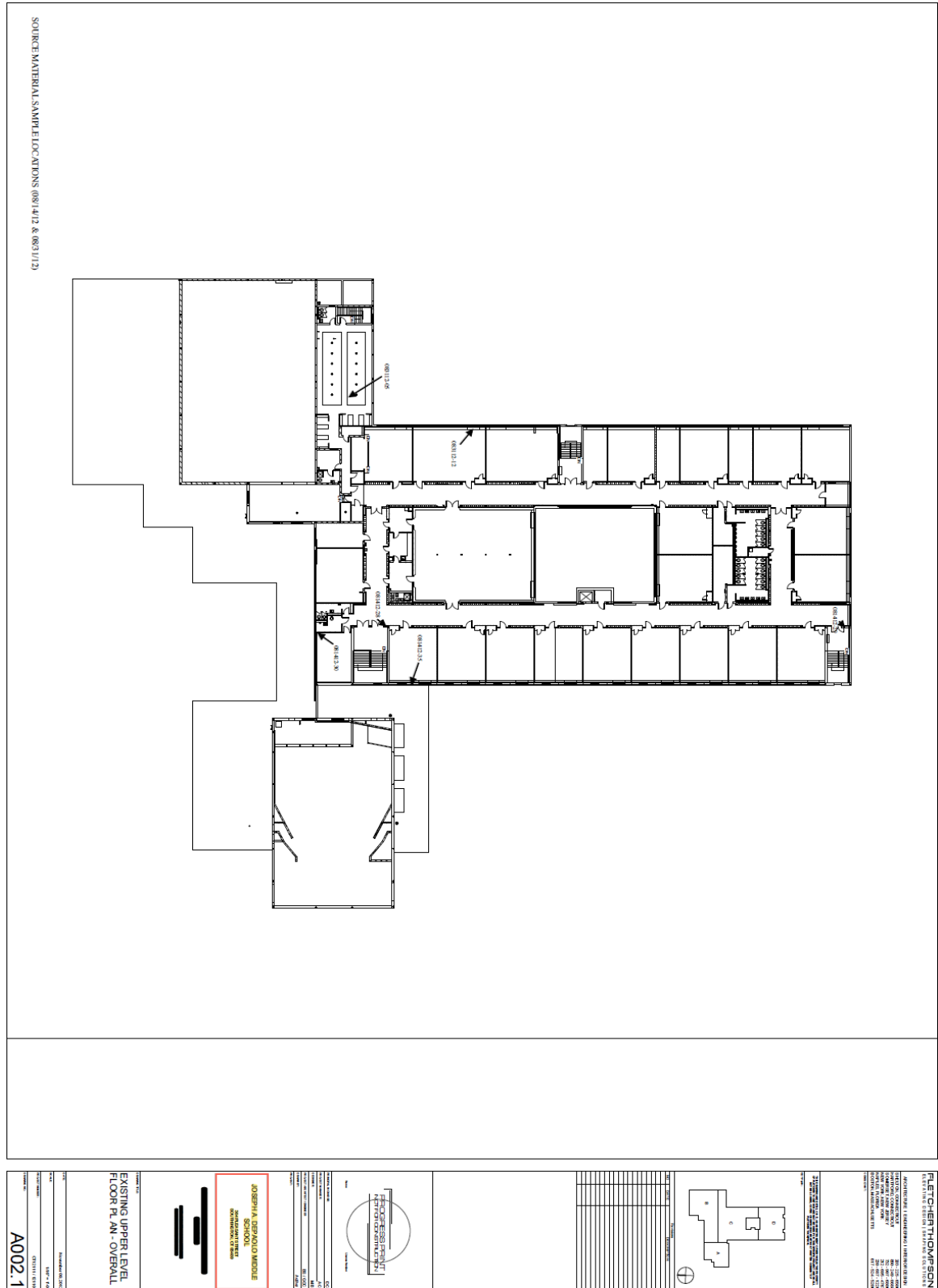
November 2012

JOSEPH A. DEPAOLO MIDDLE SCHOOL
385 PLEASANT STREET, SOUTHTON, CT
PCB SURROUNDING GROUND SAMPLE LOCATIONS & RESULTS
(There is no direct contact of caulk with surrounding concrete/asphalt around the building)

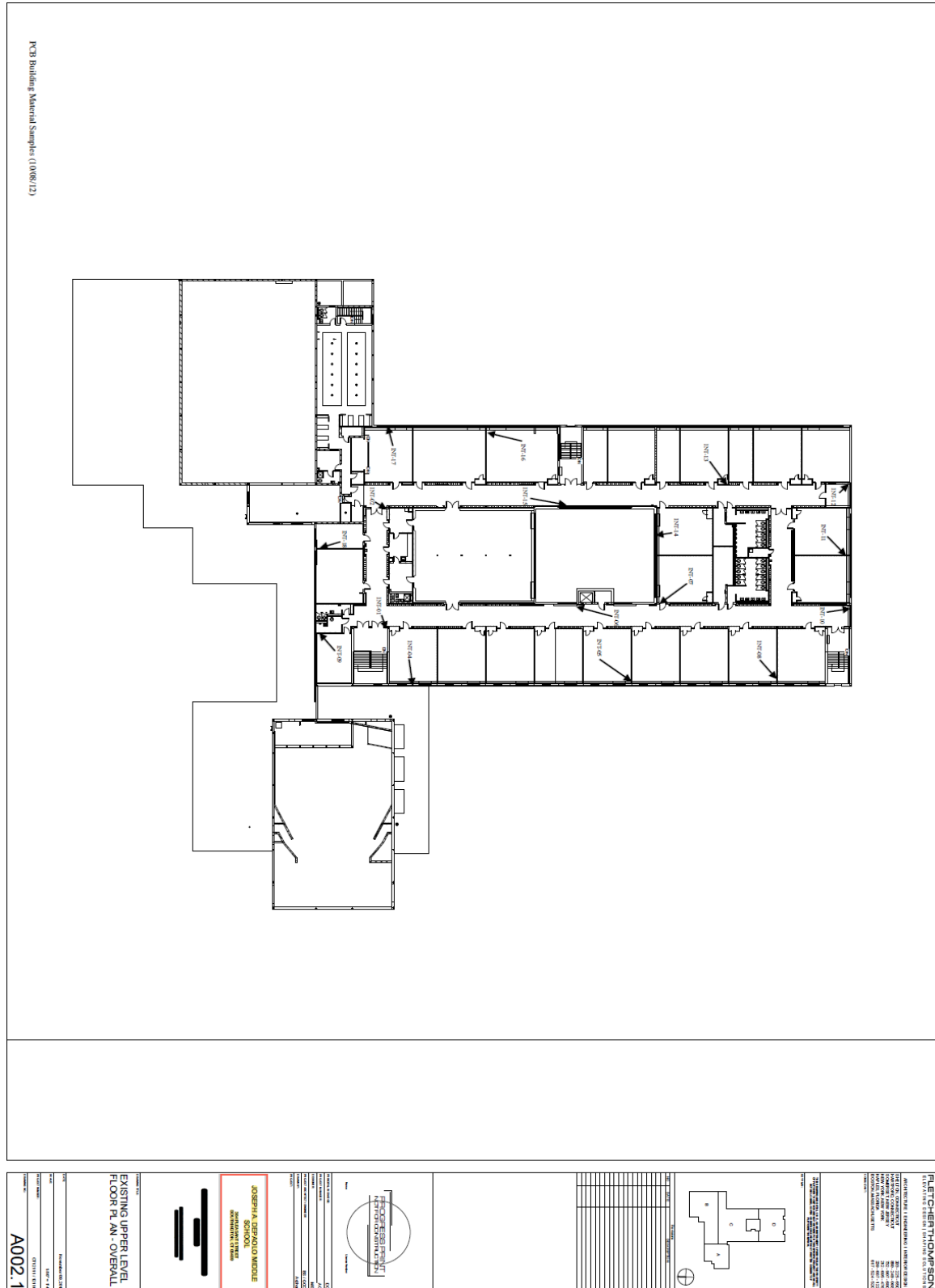
SAMPLE #	SAMPLE DESCRIPTION	RESULT
EXTG-04	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTG-05	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTG-06	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTG-06 DUP	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTG-07	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTG-08	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTG-09	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTG-10	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTG-11	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTG-12	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTG-13	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTG-14	Top 0-0.5" of Concrete at base of building, directly under caulk	None Detected
EXTG-15	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTG-16	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTG-17	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTG-18	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTG-19	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTG-20	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTG-21	Top 0-0.5" of Concrete at base of building, directly under caulk	None Detected
EXTG-22	Top 0-0.5" of Asphalt at base of building, directly under caulk	0.32 PPM (1254)
EXTG-23	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTG-24	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTG-25	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTG-27	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTG-28	Top 0-0.5" of Asphalt at base of building, directly under caulk	0.45 PPM (1254)
EXTG-29	Top 0-0.5" of Concrete at base of building, directly under caulk	None Detected
EXTG-30	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTG-31	Top 0-0.5" of Asphalt at base of building, directly under caulk	None Detected
EXTG-32	Top 0-0.5" of Concrete at base of building, directly under caulk	None Detected

PCB cleanup and disposal notification under § 761.61(a) and § 761.79(h)
Joseph A. DePaolo Middle School, Southington, CT

November 2012



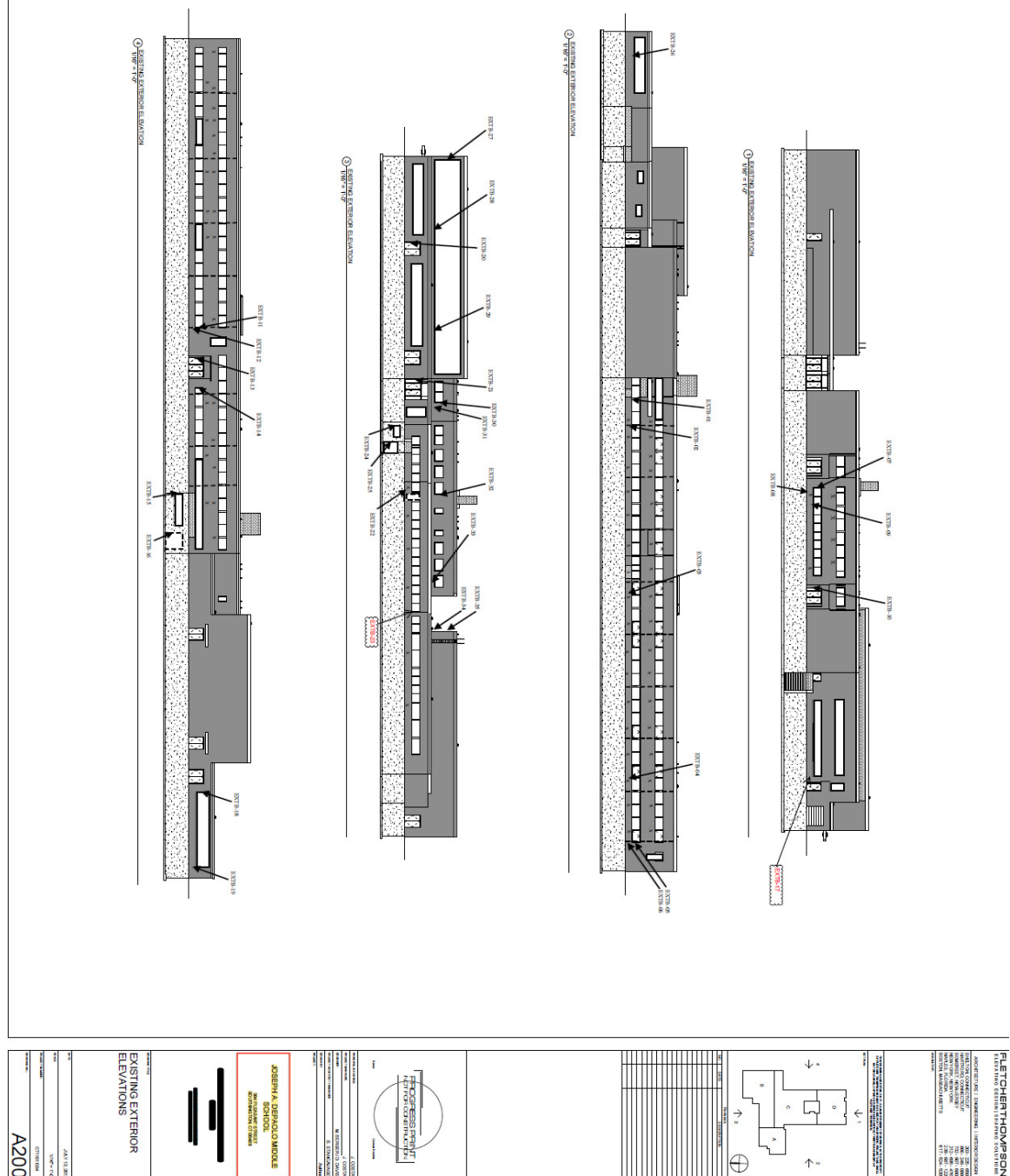








PCB Exterior Building Samples (10/08/12)



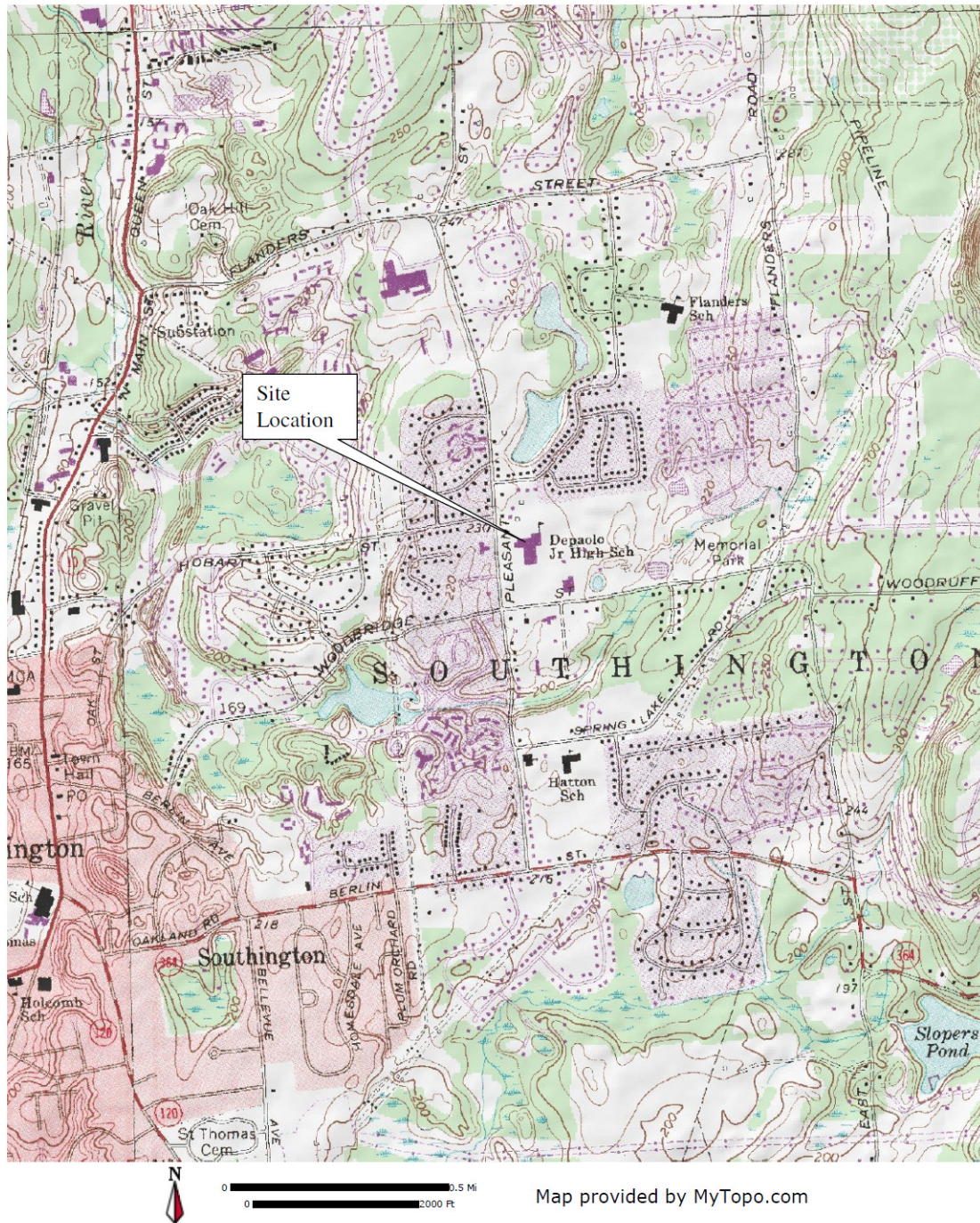


ATTACHMENT 3
PCB AIR SAMPLE RESULTS

AIR SAMPLE LOCATIONS & RESULTS

Sample Identification	Sample Locations	Sample Result
DP090912-01	Room #239	None Detected
DP090912-02	Room #225	None Detected
DP090912-03	Room #079	None Detected
DP090912-04	Room #071	None Detected
DP090912-05	Room #060	None Detected
DP090912-06	Music Room	None Detected
DP090912-07	Music Room Duplicate	None Detected
DP090912-08	Field Blank	None Detected

ATTACHMENT 4
LOCATION & EXTENT OF PCB CONTAMINATION



DISPOSAL/REMEDATION CODES

EXTERIOR REMEDIATION

- PCB-01 Remove existing exterior caulking at all masonry openings for disposal as PCB Waste >1 PPM <50 PPM. Note caulking also contains asbestos.
- PCB-02 Remove and dispose of non-porous window & door assemblies including glass, glazing compounds, panels, insulation, etc. as PCB Waste >1 PPM <50 PPM. Note glazing also contains asbestos.
- PCB-03 Remove existing exterior expansion joint caulk for disposal as PCB Waste >1 PPM <50 PPM. Note caulking also contains asbestos.
- PCB-04 Remove existing exterior through wall flashing caulk for disposal as PCB Waste >1 PPM <50 PPM. Note caulking also contains asbestos.
- PCB-05 Remove existing black fill material and dispose of as PCB Waste >1 PPM <50 PPM.
- PCB-06 Remove existing exterior caulk from the chimney locations and dispose of as PCB waste >1 PPM <50 PPM.
- PCB-16 Remove existing exterior wall moisture barrier, cinderblock and brick and dispose of PCB Bulk Product Waste >50 PPM.

INTERIOR REMEDIATION

- PCB-07 Remove existing interior metal column to block caulk and existing interior non-glazed porous cinderblock a minimum of one full block from both sides of the metal column and dispose of as PCB Bulk Product Waste >50 PPM. Decontaminate/Clean metal column of PCB caulk and contamination to a standard of <1 µg/100cm². Note that black moisture barrier is present on the back sides of the blocks which is asbestos containing and PCB containing >50 PPM. Note the caulk is also asbestos containing.
- PCB-08 Remove existing interior caulk & existing interior non-glazed porous cinderblocks a minimum of one full block from both sides of the corner and dispose of as PCB Bulk Product Waste >50 PPM. Note caulk contains asbestos. Note that black moisture barrier is present on the back sides of the outer wall blocks. This material is asbestos containing and is >50 PPM PCB containing.
- PCB-09 Remove and dispose of interior wood and ceramic flooring system and mastic and dispose of as PCB Waste >1 PPM <50 PPM. Note the mastic under the wood flooring system is asbestos containing.
- PCB-10 Existing floor slab under the wood and ceramic floor system shall be bead blasted to remove all remnants of the mastic/paper barrier. Waste generated shall be disposed of as PCB Waste >1 PPM <50 PPM. Note the mastic under the wood flooring system is asbestos containing.
- PCB-11 Remove existing unit ventilators and dispose of as PCB Bulk Product Waste >50 PPM.
- PCB-12 Remove existing interior hall door caulk for disposal as PCB Waste >1 PPM <50 PPM. Note caulking also contains asbestos.
- PCB-13 Remove and dispose of non-porous door assemblies including glass, glazing compounds, panels, insulation, etc. as PCB Waste <50 PPM.
- PCB-14 Remove existing interior masonry at door opening jams a minimum of one full cinderblock for disposal as PCB Waste <50 PPM.
- PCB-15 Remove existing interior exit door caulk for disposal as PCB Waste >1 PPM <50 PPM. Note caulk contains asbestos

**JOSEPH A. DEPAOLO MIDDLE SCHOOL
385 PLEASANT STREET, SOUTHINGTON, CT
LOCATION & EXTENT OF THE IDENTIFIED CONTAMINATED AREA – 761.61 (3)(C)**

UNIT TYPE	# of UNITS	LOCATION	LOCATION of MATERIAL	TOTAL QUANTITY	DISPOSAL CODE #s	# of CONFIRMATION SAMPLES
Building Windows	33 windows	Exterior	- Caulk on steel lintel - Caulk on window base - Caulk on window sides/jamb	- 1,450 LF - 1,450 LF - 240 LF	PCB-01 PCB-02	0
Exterior Doors	20 doors	Exterior	- Caulk on steel lintel	- 120 LF	PCB-01 PCB-02	0
		Interior	- Caulk on door sides/jamb - Caulk on door sides/jamb	- 300 LF - 300 LF	PCB-15	0
Expansion Joint	31 locations	Exterior	- Caulk in expansion joint	- 600 LF	PCB-03	0
Metal Through Wall Flashing Caulk	N/A	Exterior	- Caulk along top of metal flashing	- 1,000 LF	PCB-04	0
Sidewalk Black Fill	N/A	Exterior	- Black fill in concrete sidewalk	- 300 LF	PCB-05	0
Chimney Caulk	1 chimney	Exterior	- Caulk on 4 sides of chimney vents	- 40 LF	PCB-06	0
Metal Column Caulk	70 locations	Interior	- Caulk on both sides metal columns - One full cinderblock on both sides of column	- 420 LF - 420 LF	PCB-07	70 wipe samples from metal columns, 70 chip samples from blocks adjacent to metal columns, + duplicates and blanks
Hall & Classroom Wall Corners	577 corner	Interior	- Caulk from the wall corner - One full cinderblocks on both sides of corner	- 5,880 LF - 10,200 LF	PCB-08	577 chip samples + duplicates and blanks
Classroom Unit Ventilators	90 units	Interior	- Interior of unit ventilator	- 90 units	PCB-11	0 – the entire unit is being removed and disposed of

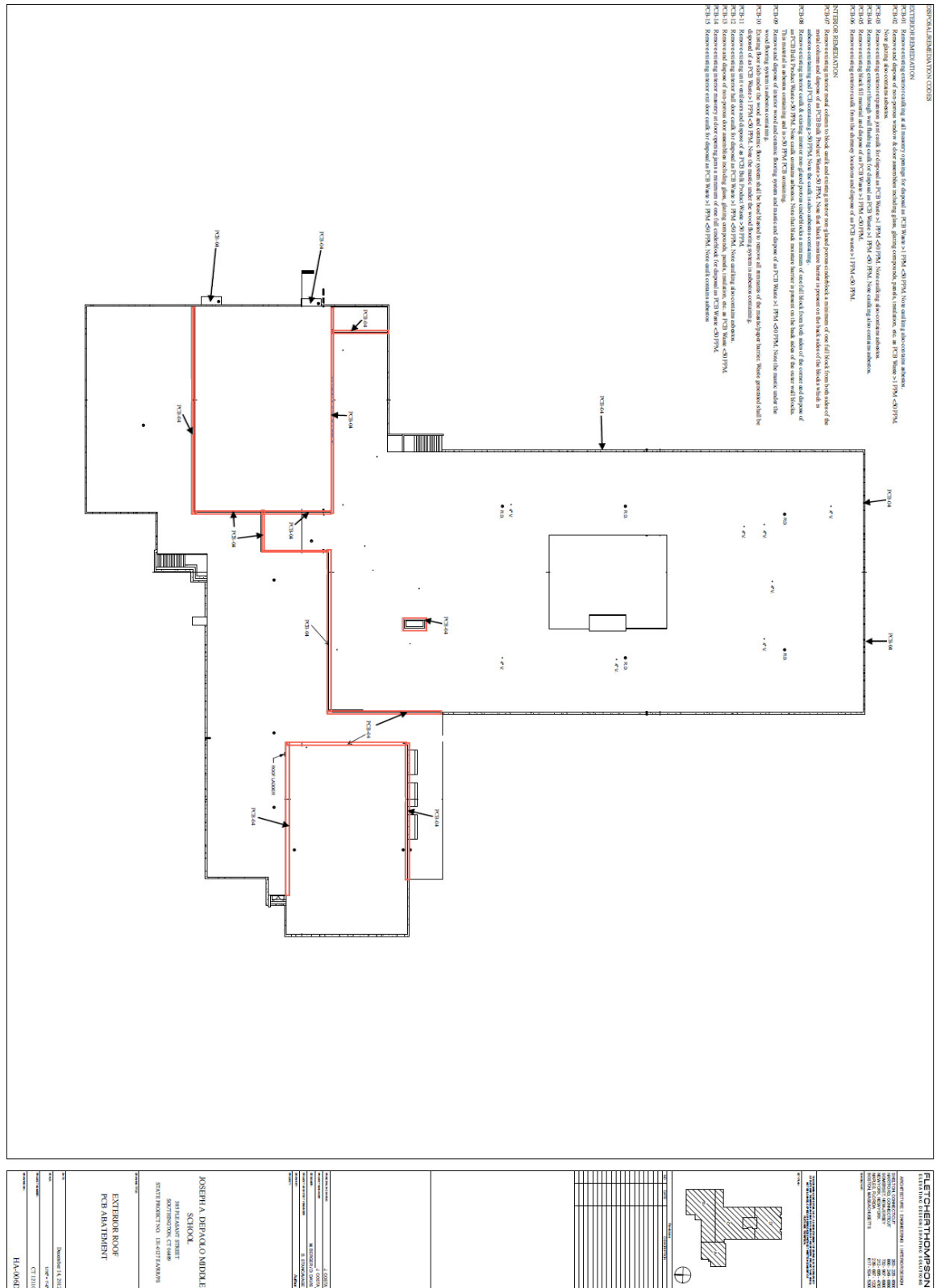
PCB cleanup and disposal notification under § 761.61(a) and § 761.79(h)
Joseph A. DePaolo Middle School, Southington, CT

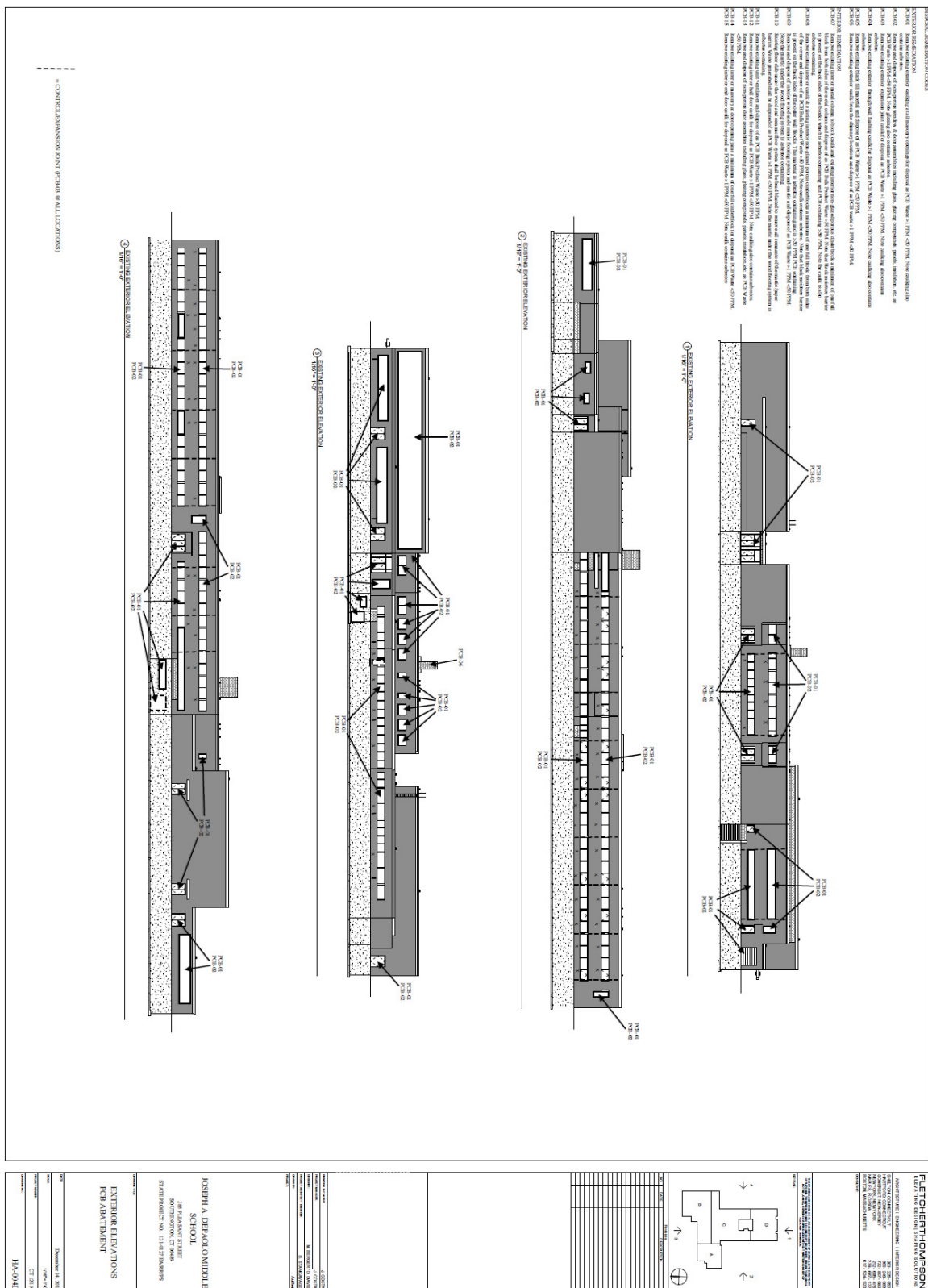
Revised February 28, 2013

Wood Floor & Ceramic Floor Paper/Mastic		Interior	- Mastic under ceramic & wood floor	- 12,000 SF	PCB-09 PCB-10	0
Hall Doors	14 doors	Interior	- Caulk on 2 sides of door - 8" of cinderblock on both door sides/jambes	- 252 LF - 245 LF	PCB-12 PCB-13 PCB-14	28 + duplicates & blanks
Between Outer Brick Wall & Inner Cinderblock Wall	See maps for specific locations	Exterior	Vapor Mastic/Paper	35,000 SF	PCB-16	0 - The remaining material is located between brick and cinderblock and is not accessible

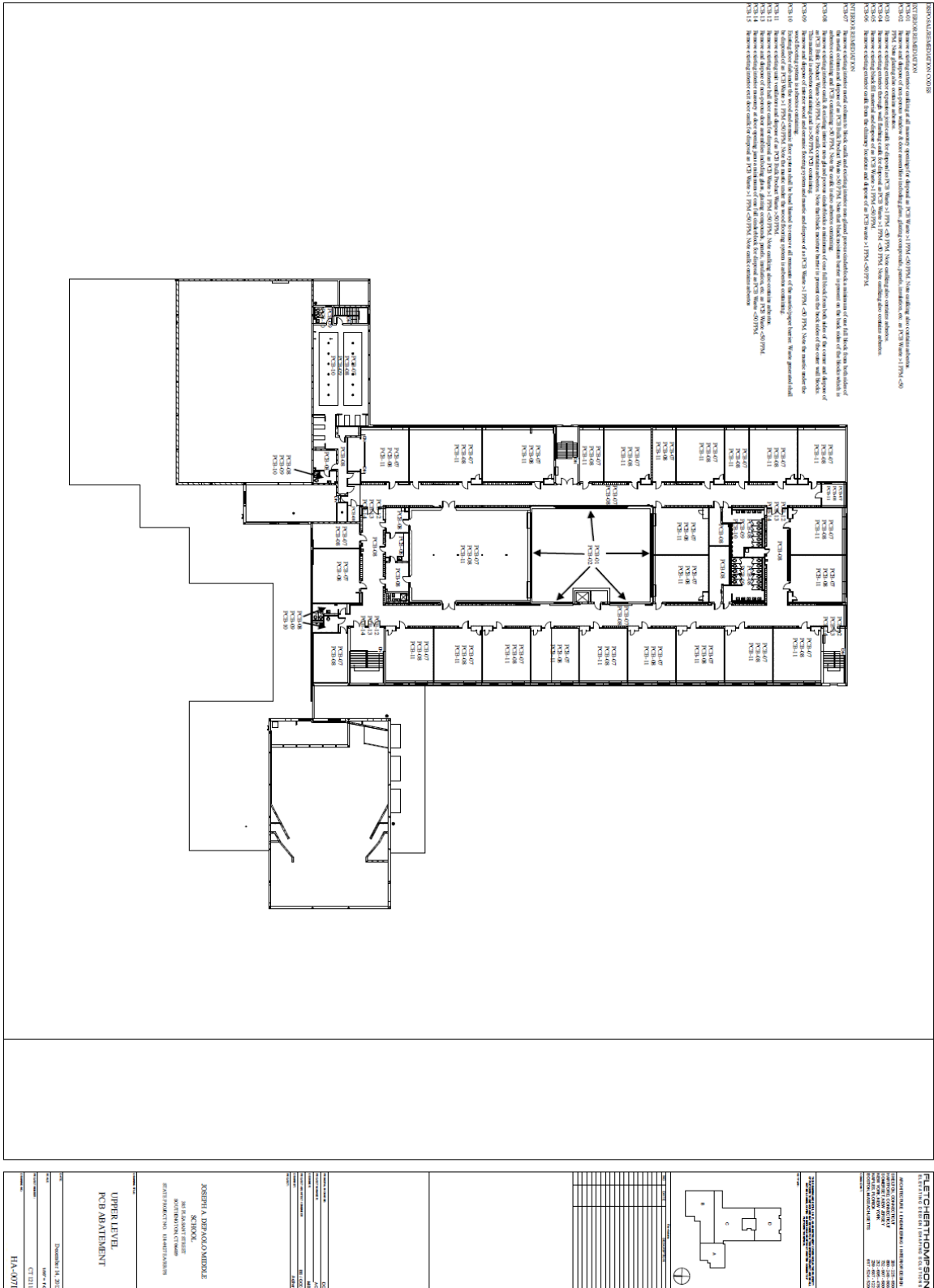
PCB cleanup and disposal notification under § 761.61(a) and § 761.79(h)
Joseph A. DePaolo Middle School, Southington, CT

Revised February 28, 2013















**ATTACHMENT 4
PCB REMEDIATION PLAN**

PCB REMEDIATION PLAN

1.1 GENERAL OVERVIEW

The work Included in this plan includes the removal and disposal of polychlorinated biphenyls (PCB) containing materials and associated building materials under a risk-based cleanup and disposal plan per 40 CFR 761.61(a) & (c) and the Contract Document to the high occupancy cleanup level of ≤ 1 PPM. The Work of this Section shall include, but not be limited to the following:

- Establishment and implementation of site preparation and controls.
- Removal of PCB containing materials and surrounding building materials.
- Transportation of PCB-containing waste materials to an approved disposal facility by a properly licensed waste hauler.
- Disposal of PCB-containing waste materials at approved waste disposal facilities.
- Collection of verification samples in accordance with a modified Subpart O sampling plan, as described in Section 1.7.
- Additional removal and verification sampling if initial verification samples exceed 1 PPM on porous surfaces and 1 ug/100cm² on non-porous surfaces.

1.2 GENERAL REQUIREMENTS

Prior to initiating any abatement activities the following requirements shall be met:

- Building and grounds will be vacant of general public during all remedial activities
- All project personnel engaged in the remediation activities shall have 40 hour HAZWOPER training.
- A site-specific plan of the safety precautions and OSHA compliance program for the project will be developed by the remediation contractor. The plan will govern all work conducted at the site during the abatement of PCBs and related debris, waste handling, sampling, management and waste transportation. It will ensure that all workers follow applicable Federal and State regulations regarding the work activities.
- A respirator program as required by ANSI Z88.2, 29 CFR 1926.1101, and 29 CFR 1926.103 shall be established and implemented for the project by the remediation contractor.
- All parts of 29 CFR Part 1926.59 shall be adhered to, and copies of the Material Safety Data Sheets (MSDS) for all materials brought to the site shall be prominently displayed.
- Prior to any ground removal work, the boundaries of the excavation area shall be marked, properly secured and a permit number obtained from "Call Before You Dig" shall be obtained by the remediation contractor.
- Additional notification will be provided to the Connecticut Department of Energy and Environmental Protection (CT DEEP).

1.3 SITE PREPARATION AND CONTROLS

The following containment procedures will be utilized when removing the source materials and building materials:

- The project site shall be enclosed by a construction chain link fence. During all remediation activities the remediation contractor shall maintain control of all entrances and exits to the project site to ensure that only authorized personnel enter the work areas and are provided with the proper personal protective

- equipment and respiratory protection. All approaches to work areas shall be posted with the appropriate warning signs.
- Work zones shall be established with an abatement zone, a decontamination zone and a support zone.
 - Full containments constructed of polyethylene sheeting will be used to enclose and isolate each area where PCB containing source and building materials (>50 PPM) are to be removed. HEPA air filtering machines will also be utilized to create negative pressure and control dust generated during removal activities. Ground protection in containment areas shall include the use of a water impervious membrane to prevent water and debris from escaping the abatement zone.
 - A decontamination zone will be constructed at the containment exit point that all personnel will utilize when entering and exiting the containment area. Access to the abatement area will only be allowed through the decontamination area and controlled by the contractor.
 - A support zone will be constructed outside of the decontamination zone and the remainder of the project site to facilitate administrative and other support activities that do not need to occur in the decontamination zone. Access to the support zone will be controlled by the contractor.
 - All powered tools will be equipped HEPA filtered dust collection systems and appropriate tool guards. Tools and equipment will be wet wiped and HEPA vacuumed prior to the removal from containment areas.
 - All surfaces adjacent to materials removed shall be properly decontaminated upon completing the removal of PCB Wastes. The work to remove PCB containing materials will result in dust on surfaces to remain and this dust may contain PCBs. All visible dust shall be removed using HEPA vacuums and wet cleaning methods with solvent or other acceptable products.
 - Background monitoring will be performed using a Dust Trak monitor for total dust prior to the start of work and during mobilization/preparation for the site. Once remediation has begun the Dust Trak monitor will be used to evaluate nuisance dust along the perimeter of the containment areas on a daily basis to show containment effectiveness. If site conditions exceed two and a half times (2.5x) the background levels or the EPA set National Ambient Air Quality Standards of $150 \mu\text{g}/\text{m}^3$, whichever is lower, for any extended period of time, further engineering controls or a change in work methods will be implemented.

1.4 PCB-CONTAINING BUILDING MATERIAL REMOVAL >50 ppm

- All materials scheduled for removal with PCB levels >50 ppm shall be removed under full containment, negative pressure enclosures.
- All abatement areas shall be continuously wetted to minimize dust generation during removal.
- Caulk compound, metal non-porous unit ventilator systems and cinderblock building materials shall be handled and removed in a manner which does not breakdown the materials into a fine dust or powder where possible. Grinders or other mechanical equipment may be employed only if they are fitted with HEPA-filtered dust collectors.
- All materials removed will be placed in temporary lined containers at the point of generation and transferred from the containment area to the waste containers along a designated route. The waste will then be properly containerized, transported off-site and disposed of in accordance with 40 CFR 761.62 as bulk product waste.
- The general sequence of removal shall be as follows:
 1. Caulk and cinderblock shall be removed in their entirety for disposal as PCB Bulk Product Waste. Bulk samples were collected of the interior

- cinderblocks 6" outside the line of caulk and analyzed for PCB contamination. Levels of PCBs were detected in most of the cinderblock samples at this distance. Based on these results the cinderblock will be removed a minimum of one full block from both sides of the metal column and corner walls from the lintel or floor to the ceiling deck.
2. After the caulk and building material removal is completed, the metal columns shall have all caulk remnants removed and the surface cleaned with solvent based cleaners and wire brush to remove any remaining caulk and to decontaminate the surface.
 3. Unit ventilators in each room shall be removed in their entirety for disposal as PCB Bulk Product Waste.
- Work shall be coordinated to ensure proper shoring and bracing of materials above prior to the performance of work.
 - The use of minimal quantities of water to moisten any dust prior to collection shall be utilized. PCB waste shall never show evidence of free liquid water, pooling or ponding within the waste stream.
 - The use of negative pressure shall be used to reduce dust generation.
 - The material shall be cut out using hand tools or HEPA- filtered mechanical equipment and placed in temporary lined containers at the point of generation, transferred from the containment area to the waste containers along a designated route and then be properly containerized, transported off-site and disposed of as PCB Bulk Product Waste >50PPM.

1.5 PCB WASTE MATERIALS >1 PPM <50PPM

- Waste Materials including caulking associated with metal non-porous door systems, metal non-porous window systems, metal non-porous vents, metal non-porous through wall flashing, black fill associated with concrete sidewalks and black vapor barrier associated with ceramic and wood flooring materials and adjacent cinderblock, concrete and brick building materials will be handled and removed from specified locations as follows:
 1. Remove and dispose of interior hallway non-porous metal door systems and dispose of as PCB Waste <50 ppm.
 2. Remove and dispose of caulk and eight inches of cinderblock on each side of the interior hallway doors from the floor to ceiling deck and dispose of as PCB Waste <50 ppm.
 3. Remove existing exterior caulking and non-porous window & door assemblies and dispose of as PCB Waste <50 ppm. Note caulking also contains asbestos.
 4. Remove existing interior caulk from the exterior door openings and dispose of as PCB Waste <50 PPM.
 5. Remove existing exterior caulk from all control joints and dispose of as PCB Waste <50 ppm. Note caulking also contains asbestos.
 6. Remove existing exterior metal roof through wall flashing caulk and dispose of as PCB Waste <50 ppm.
 7. Remove existing exterior chimney caulk and dispose of as PCB Waste <50 ppm.
 8. Remove existing black fill material from concrete sidewalk and dispose of as PCB Waste <50 ppm.
 9. Remove ceramic flooring system, wood flooring system and the vapor barrier/mastic below and dispose of as PCB Waste <50 ppm. In addition, a minimum of 1/32 of an inch of concrete shall be removed from the top of the slab under the barrier materials and disposed of as PCB Waste <50 ppm.

- Window and door systems in direct contact with caulk material shall be removed in their entirety and disposed of as PCB waste.
- All caulk or PCB containing material associated with the items listed above that remain in place after unit removal shall be removed and disposed of as PCB waste <50 ppm.
- The material shall be cut out using hand tools or HEPA- filtered mechanical equipment and placed in temporary lined containers at the point of generation, transferred from the containment area to the waste containers along a designated route and then be properly containerized, transported off-site and disposed of as PCB waste <50 PPM..
- Wet methods and negative pressure will be used at all time to reduce dust generation.

1.6 PCB LIQUID WASTE

- Water will be utilized in a number of functions throughout the abatement process from wetting surfaces down prior to remediation to decontamination of equipment and personnel prior to exiting abatement zones. Any liquid used shall be collected and decontaminated in accordance with 40 CFR 761.79 (b) or disposed of as PCB Liquid Waste in accordance with 40 CFR 761.60 (a).
- Under no circumstances will evidence of free liquid water or pooling be allowed in the waste stream.

1.7 VERIFICATION INSPECTION AND SAMPLING

The Owner's representative, after completion of remediation in each work area by the remediation contractor, shall perform a visual inspection to ensure that all PCB materials identified for removal have been removed and that no visible dust, debris or residue is present on the surfaces of adjacent building materials, protective coverings and isolation barriers. Post verification sampling shall not be performed until an area has passed the visual inspection. Once passed, the following post verification sampling shall be performed:

Interior Porous Concrete Block Surfaces

- The Owner's representative shall follow the EPA's "Standard Operating Procedure For Sampling Porous Surfaces for Polychlorinated Biphenyls (PCBS)" dated 05/05/11 to collect verification samples
- Verification sampling locations will be collected from the vertical edges of the masonry openings that are associated with interior corner walls and the interior metal columns.
- The requirements for sample location as detailed in Sub-part O shall be applied in a linear fashion instead of a grid pattern since the surfaces to be verified are irregular in shape. Based on the initial sampling performed of building materials in 2012, post sampling locations will be conducted using the following:
 - one (1) chip sample from a vertical edge from each corner wall.
 - one (1) chip sample from a vertical edge from each column
 - one (1) chip sample from vertical edge on each side of the interior hallway doors.
- A total of approximately 675 verification samples shall be collected along with 10% duplicate samples and one (1) equipment blank per twenty samples per sampling event.

- The laboratory shall be an accredited laboratory for PCB analysis. All samples will be extracted using USEPA Method 3540C and analyzed for PCBs using ESEPA Method 8082.
- Analytical results of ≤ 1 PPM for unrestricted use based on high occupancy use of the structure will mean the project is complete and results of >1 PPM will mean that additional remediation and verification sampling are required.

Metal Column Surfaces

- The requirements for sample location as detailed in Sub-part P shall be applied in a linear fashion instead of a grid pattern since the columns to be verified are irregular in shape. Post sampling locations will be conducted using the following:
 - one (1) wipe sample from each metal column in each room where caulk material is removed.
- A total of approximately 70 verification samples shall be collected along with 10% duplicate samples and one (1) equipment blank per twenty samples per sampling event.
- Verification sample locations will be selected on each surface using a random number generator.
- All samples will be extracted using USEPA Method 3540C and analyzed for PCBs using ESEPA Method 8082.
- Analytical results of ≤ 1 $\mu\text{g}/100\text{ cm}^2$ will mean the project is complete and results of >1 $\mu\text{g}/100\text{ cm}^2$ will mean that additional remediation and verification sampling area required.

Interior Floor Surfaces

- In all areas where windows, doors or other building components are removed with PCB contamination wipe samples shall be collected. Samples shall be collected from the floor in the area of the containment after it has been decontaminated and removed to verify the effectiveness of the containment procedures. A total of 80 samples for verification will be collected, 1 blank sample and 1 duplicate per 20 samples will be collected for each sampling episode.
- Wipe samples will be collected following the standard wipe test procedures described in 40 CFR 761.123
- The laboratory shall be an accredited laboratory for PCB analysis. All samples will be extracted using USEPA Method 3540C and analyzed for PCBs using USEPA Method 8082.
- Analytical results of ≤ 1 $\mu\text{g}/100\text{ cm}^2$ will be considered in compliance with the State of Connecticut Department of Public Health and EPA recommended limit.

Interior Air Samples

- Upon completion of work in remediation zones where components are removed with PCB materials the Owner's representative will collect interior air samples.
- Air samples will be collected in accordance with EPA Method TO-10A. Sufficient sample volume will be collected to ensure a minimum laboratory reporting limit of approximately 50 nanograms/ m^3 .
- Two air samples shall be collected from within each remediation zone and one air sample shall be collected from remote locations on the first and second floor at the completion of PCB remediation. In addition a field duplicate and a field blank shall be collected during each sampling episode.
- If sample concentrations are exceeded in any area additional sampling may be required.

- Air samples shall be collected in the center of the room/area, approximately four (4') feet from the floor, using polyurethane foam (PUF) cartridges connected to a pump with tubing.
- The laboratory shall be accredited for PCB analysis. All samples will be analyzed by USEPA Method TO-10A and at a minimum shall include PCB homologues and/or PCB congeners. Sample results shall be evaluated using EPA SW846 Chapter 9 for statistical accuracy.
- Analytical results of <300 nanograms PCBs per cubic meter of air will be considered satisfactory.

1.8 VERIFICATION SAMPLE FAILURE

Should any of the verification samples exceed the specified limits additional removal and/or cleaning will be required.

- For chip sample failure, additional block removal will be performed by the Remediation Contractor. An additional eight inches (8") of block will be removed from each side of the opening where the chip sample failure occurred. The Owner's Representative will re-test locations that exceeded the specified limits.
- For failed wipe and/or air samples the Remediation Contractor, at their own expense, shall decontaminate/clean the affected area. The Owner's Representative will re-test locations that exceeded the specified limits. The cost for the re-tests, including fees for the Owner's Representative, sample shipping, and laboratory analysis of samples (including any necessary blanks, spikes and reference samples), shall be deducted from the Owner's final payment to the Contractor.

1.9 WASTE MANAGEMENT AND DISPOSAL

The following will be performed for the storage and disposal of PCB waste:

- All PCB containing caulk & building materials will properly containerized, transported and disposed of in accordance with 40 CFR 761.62 as PCB Bulk Product Waste.
- In accordance with 40 CFR 761.65, secured, lined and covered waste containers or 55-gallon DOT-approved steel containers will be maintained on site and staged for the collection of PCB waste generated during work activities. All containers will be properly labeled and marked in accordance with 40 CFR 761.40
- At the completion of the project or when a waste container is full, the PCB bulk product waste shall be removed from the site and properly disposed of at an EPA approved disposal facility. PCB waste <50 ppm may also be disposed of at a state-approved non-hazardous waste landfill in accordance with 40 CFR 761.61(a)(5).
- Copies of all manifests, waste shipment records and certificates of disposal will be collected for inclusion in the final report to the EPA.

1.10 SITE USE AFTER REMEDIATION

At the completion of remediation activities and upon receipt of sample verification, the building will be re-constructed and utilized as a middle school building.

1.11 PROJECT RECORDKEEPING

As per 40 CFR 761 records and documents will be maintained at a single location and will be made available to the EPA upon their request. A final report summarizing the abatement and disposal activities will be prepared and submitted to the EPA.

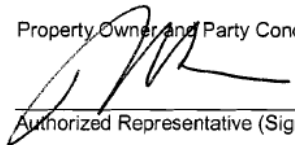
**ATTACHMENT 5
WRITTEN CERTIFICATION**

WRITTEN CERTIFICATION

The undersigned owner of the property, Joseph A. DePaolo Middle School, 385 Pleasant Street Southington, CT, where the cleanup site is located and the party conducting the cleanup certify that all sampling plans, sampling collection procedures, sample preparation procedures, extraction procedures and instrumental/chemical analysis procedures used to assess or characterize the PCB contamination at the cleanup site are on file at the location indicated below and are available for EPA inspection.

Documentation Location:
Southington Public Schools
200 North Main Street
Southington, CT 06489

Property Owner and Party Conducting Site Cleanup



Authorized Representative (Signature)

November 27, 2012

Date

Mark J. Sciota

Authorized Representative (Print)

Deputy Town Manager/Town Attorney

Title/Position

ATTACHMENT 6
CONNECTICUT DEPARTMENT OF ENERGY & ENVIRONMENTAL
PROTECTION NOTIFICATION

ATTACHMENT 7
PCB ANALYTICAL REPORTS